

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:)	In Proceedings Under Chapter 11
)	Case No. 25-40745-659
DOUBLE HELIX CORPORATION,)	Honorable Kathy A. Surratt-States
d/b/a KDHX COMMUNITY MEDIA,)	
)	Hearing Date: May 13, 2025
Debtor.)	Hearing Time: 10:00 a.m.
)	Hearing Location: Courtroom 7 North
)	Response Deadline: May 13, 2025 at 9:00 a.m.
)	
)	Robert E. Eggmann, Esq.
)	Carmody MacDonald P.C.
)	120 S. Central Ave., Suite 1800
)	St. Louis, MO 63005
)	(314) 854-8600
)	ree@carmodymacdonald.com

**MOTION TO SHORTEN NOTICE AND EXPEDITE HEARING ON DEBTOR'S
MOTION FOR ENTRY OF ORDERS: (I) APPROVING (A) BIDDING PROCEDURES,
(B) DESIGNATION OF STALKING HORSE BIDDER AND STALKING HORSE BID
PROTECTIONS, (C) SCHEDULING AUCTION AND SALE HEARING, (D) FORM
AND MANNER OF NOTICE OF SALE, AUCTION, AND SALE HEARING; AND
(E) ASSUMPTION AND ASSIGNMENT PROCEDURES AND FORM NOTICE
THEREOF; AND (II) GRANTING RELATED RELIEF**

COMES NOW Double Helix Corporation d/b/a KDHX Community Media, as debtor and debtor in possession (the “**Debtor**”) by and through its undersigned counsel, pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and L.R. 9013-2 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Missouri (the “**Local Rules**”) and files its *Motion to Shorten Notice and Expedite Hearing on Debtor's Motion for Entry of Orders: (I) Approving (a) Bidding Procedures, (b) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (c) Scheduling Auction and Sale Hearing, (d) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (e) Assumption and*

Assignment Procedures and Form Notice Thereof; and (II) Granting Related Relief (the “**Motion to Expedite**”).¹ In support thereof, Debtor respectfully states as follows:

1. On March 10, 2025 (the “**Petition Date**”), Debtor filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “**Bankruptcy Code**”), commencing a bankruptcy case in the United States Bankruptcy Court for the Eastern District of Missouri (the “**Bankruptcy Court**” or this “**Court**”) under Case No. 25-40745-659 (the “**Chapter 11 Case**”). Debtor continues to operate its business as debtor-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in this Chapter 11 Case.

2. Contemporaneously herewith, Debtor filed its *Motion for Entry of Orders: (I) Approving (a) Bidding Procedures, (b) Designation of Stalking Horse Bidder and Stalking Horse Bid Protections, (c) Scheduling Auction and Sale Hearing, (d) Form and Manner of Notice of Sale, Auction, and Sale Hearing, and (e) Assumption and Assignment Procedures and Form Notice Thereof; and (II) Granting Related Relief* (the “**Underlying Motion**”).

3. Debtor respectfully requests that an expedited hearing for the Court to consider and act upon the Underlying Motion, and any responses thereto, be held **on May 13, 2025 at 10:00 a.m.**, or as soon thereafter as the Court may be available.

4. The relief requested in the Motions is necessary to avoid harm to Debtor’s ability to reorganize and to operate in the ordinary course of business.

5. Good cause exists for this Court to enter an order expediting the hearing of the Underlying Motion, and any responses thereto, on shortened notice deadline in that it will allow

¹ Capitalized terms used in this Motion to Expedite but not defined herein shall have the meanings ascribed to them in the Underlying Motion.

Debtor to expedite a proposed auction procedure for the sale of substantially all of Debtor's Assets, to the benefit of the estate and its creditors.

WHEREFORE, Debtor hereby respectfully request the Court enter an Order:

- a. granting this Motion to Expedite Hearing;
- b. setting the Underlying Motion and Motion to Expedite, and any responses thereto, for expedited hearing on or prior to May 13, 2025 at 10:00 a.m., or as soon thereafter as counsel may be heard;
- c. and providing for such other and further relief as this Court deems just and proper.

Respectfully submitted,

CARMODY MACDONALD P.C.

By: /s/ Robert E. Eggmann
ROBERT E. EGGMANN #37374MO
NATHAN R. WALLACE #74890MO
120 S. Central Avenue, Suite 1800
St. Louis, Missouri 63105
(314) 854-8600
(314) 854-8660 – FAX
ree@carmodymacdonald.com
nrw@carmodymacdonald.com
ATTORNEYS FOR DEBTOR